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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 LYNN THOMPSON,  
10  
11 Plaintiff,

12 vs.

13 TESLA MOTORS, INC.; ELON MUSK;  
14 ONQGLOBAL, INC.; DOES 1-50,  
15  
16 Defendants.

**CASE NO.: 3:21-cv-00238-HDM-CSD**  
**ORDER GRANTING**  
**STIPULATION AND ORDER TO**  
**EXTEND TIME TO RESPOND TO**  
**DEFENDANTS' FILINGS**  
**(FIRST REQUEST)**

16  
17 Pursuant to LR 7-1, LR IA 6-1, and LR IA 6-2, the parties Plaintiff LYNN THOMPSON  
18 and Defendants TESLA MOTORS, INC. and ONQGLOBAL, INC., by and through their  
19 respective counsel of record hereby stipulate to extend the time for Plaintiff to file his Response  
20 to: Defendant OnQGlobal, Inc.'s Rule 12(B)(6) Motion to Dismiss [ECF No. 42]; Defendant  
21 OnQGlobal, Inc.'s Request for Judicial Notice in Support of Defendant OnQGlobal, Inc.'s Rule  
22 12(B)(6) Motion to Dismiss [ECF No. 43]; Defendant Tesla Motors, Inc.'s Motion to Dismiss  
23 Plaintiff's Complaint [ECF No. 44]; Defendant Tesla Motors, Inc.'s Motion to Confirm  
24 Arbitration Award [ECF No. 45]; Defendant Tesla Motors, Inc.'s: (1) Request for Judicial  
25 Notice of Adjudicative Facts; and (2) Joinder to OnQGlobal, Inc.'s Request for Judicial Notice  
26 [ECF Nos. 46 & 47]; Defendant Tesla Motors, Inc.'s Motion to Stay Discovery Pending  
27 Decision on Motion to Dismiss [ECF No. 48]; Defendant OnQGlobal, Inc.'s Joinder to  
28 Defendant Tesla Motors, Inc.'s: (1) Motion to Dismiss [ECF No. 44]; (2) Request for Judicial

1 Notice [ECF No. 46]; and (3) Motion to Stay Discovery [ECF No. 48] [ECF Nos. 49, 50, &  
2 51].

3 Defendant OnQGlobal filed a Rule 12(B)(6) Motion to Dismiss on June 1, 2022 [ECF  
4 No. 42]. On that same date, June 1, 2022, Defendant OnQGlobal filed a Request for Judicial  
5 Notice in Support Defendant OnQGlobal, Inc.'s Rule 12(B)(6) Motion to Dismiss [ECF No.  
6 43]. The current deadline for Plaintiff to file his response is June 14, 2022.

7 Defendant Tesla Motors, Inc. filed a Motion to Dismiss Plaintiff's Complaint on June  
8 3, 2022 [ECF No. 44]. On that same date, June 3, 2022, Defendant Tesla Motors, Inc. filed a  
9 Motion to Confirm Arbitration Award [ECF No. 45]. Defendant Tesla Motors, Inc. also filed a  
10 Request for Judicial Notice of Adjudicative Facts and Joinder to OnQGlobal, Inc.'s Request for  
11 Judicial Notice [ECF Nos. 46 & 47] on June 3, 2022. Finally, Defendant Tesla Motors, Inc.  
12 filed a Motion to Stay Discovery Pending Decision on Motion to Dismiss on June 3, 2022 [ECF  
13 No. 48].

14 Defendant OnQGlobal, Inc. then filed a Joinder to Defendant Tesla Motors, Inc.'s: (1)  
15 Motion to Dismiss [ECF No. 44]; (2) Request for Judicial Notice [ECF No. 46]; and (3) Motion  
16 to Stay Discovery [ECF No. 48] on June 6, 2022 [ECF Nos. 49, 50, & 51].

17 Accordingly, Plaintiff must file: 1) his responses to ECF Nos. 42 & 43 by June 15, 2022;  
18 2) his responses to ECF Nos. 44, 45, 46, 47, & 48 by June 17, 2022; and 3) his responses to  
19 ECF Nos. 49, 50, & 51 by June 20, 2022.

20 Due to the sheer volume of filings that Plaintiff must respond to, Plaintiff seeks an  
21 extension to respond to all of the filings until June 28, 2022. The basis for this request is that  
22 Plaintiff's counsel needs time to thoroughly review and respond to each and every filing.  
23 Plaintiff's counsel must also discuss many issues that have arisen in these filings with Plaintiff.  
24 This request is made in good faith and not for the purposes of delay.

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The parties stipulate and agree through their respective counsel that the Court grant Plaintiff an extension of time, up to and including June 28, 2022, to file his Responses.

Dated this 15th day of June 2022.

Dated this 15th day of June 2022.

**HKM EMPLOYMENT ATTORNEYS LLP**

**FENNEMORE CRAIG, P.C.**

/s/ Jenny L. Foley

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Dated this 15th day of June 2022.

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**ORDER**

IT IS SO ORDERED:

Howard D. McKibbin

UNITED STATES DISTRICT JUDGE

DATED: June 15, 2022